## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA

Alexandria Division

| MEADWESTVACO CORPORATION, et al. | )  |                    |
|----------------------------------|----|--------------------|
|                                  | )  |                    |
| Plaintiffs                       | )  |                    |
|                                  | )  |                    |
| ν.                               | )  | Case No. 1:10cv511 |
|                                  | )  | (GBL/TRJ)          |
| REXAM PLC, et al.                | )  |                    |
|                                  | )  |                    |
| <u>Defendants</u>                | _) |                    |

# REXAM'S MEMORANDUM OF LAW IN OPPOSITION TO PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT OF PATENT VALIDITY AND ENFORCEABILITY

FILED UNDER SEAL

### Respectfully submitted,

## REXAM BEAUTY & CLOSURES INC. AND REXAM DISPENSING SYSTEMS S.A.S.

Date: June 27, 2011 /s/Craig C. Reilly

Attorney for Rexam Beauty and Closures Inc. and Rexam Dispensing Systems, S.A.S.:

Craig C. Reilly, Esq. VSB # 20942 111 Oronoco Street Alexandria, Virginia 22314 TEL (703) 549-5354 FAX (703) 549-2604 craig.reilly@ccreillylaw.com

#### Of Counsel:

ST. ONGE STEWARD JOHNSTON & REENS LLC 986 Bedford Street
Stamford, Connecticut 06905-5619
Telephone: (203) 324-6155

Facsimile: (203) 327-1096 Email: litigation@ssjr.com

#### **CERTIFICATE OF SERVICE**

I hereby certify that on this 27th day of June 2011, a true and correct copy of the foregoing pleading or paper was served using the Court's CM/ECF system, with electronic notification of such filing to the following counsel of record:

Thomas G. Slater, Jr.

EMAIL: tslater@hunton.com

Shelley L. Spalding

EMAIL: sspalding@hunton.com

HUNTON & WILLIAMS LLP

951 E Byrd St Riverfront Plaza

Richmond, VA 23219

TEL: (804) 788-8200

FAX: (804) 788-8218

Counsel for Plaintiffs

Brendan J. McMurrer

EMAIL: bmcmurrer@sidley.com

Griffith L. Green

EMAIL: ggreen@sidley.com

SIDLEY AUSTIN LLP

1501 K Street, N.W.

Washington, D.C. 20005

Tel: (202) 736-8000

Fax: (202) 736-8711

Attorneys for Defendants Valois S.A.S., and

Valois of America, Inc.

/s/Craig C. Reilly

Craig C. Reilly VSB # 20942

111 Oronoco Street

Alexandria, Virginia 22314

TEL: (703) 549-5354

FAX: (703) 549-2604

EMAIL: craig.reilly@ccreillylaw.com

Counsel for Rexam Beauty

and Closures Inc. and Rexam Dispensing

Systems, S.A.S.